

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

JANE DOE,

Plaintiff,

vs.

BROWN UNIVERSITY; et al.,

Defendants.

Case No.: 1:16-cv-00562-S-LDA

REQUEST FOR EXPEDITED
CONSIDERATION

REPLY IN SUPPORT OF
JOHN SMITH'S MOTION TO COMPEL INTERROGATORY RESPONSE
BY BROWN UNIVERSITY

The defendant, John Smith, requests pursuant to L.R. Cv. 9 that the Court afford his motion to compel expedited consideration. The purpose of the motion is to locate and serve a deposition subpoena to a percipient witness, Michael Jones. He is the man who allegedly had relations with Jane Doe on October 18, 2014. However, upon information and belief, Mr. Jones will graduate on May 27, 2018. If the Court does not consider the motion promptly, relief may arrive too late to be of use to John Smith. Specifically, Michael Jones may leave the state and thus avoid service of the subpoena. Upon information and belief, Mr. Jones is not a permanent resident of Rhode Island and his family resides in Georgia. Accordingly, after graduation, it may be significantly more difficult to find and serve Mr. Jones with a subpoena.

Date: May 1, 2018

The Defendant, John Smith,
By his Attorney,

/s/ J. Richard Ratcliffe
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CERTIFICATE OF SERVICE

I, J. Richard Ratcliffe, certify that on May 1, 2018, I served this document on the following counsel of record by electronic means pursuant to L.R. Gen. 301:

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/s/ J. Richard Ratcliffe